

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:22-cr-58-LG-RHWR

PATRICK DARNELL DANIELS, JR.

**UNITED STATES OF AMERICA’S UNOPPOSED MOTION  
FOR PRELIMINARY ORDER OF FORFEITURE**

The United States of America, by and through the United States Attorney and the undersigned Assistant United States Attorney for the Southern District of Mississippi, moves for a preliminary order of forfeiture, stating:

1. On May 17, 2022, a single-count Indictment [13] was filed against **PATRICK DARNELL DANIELS, JR.**, charging him with being an unlawful user of a controlled substance in possession of a firearm, in violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2).

2. The Indictment [13] included a Notice of Intent to Seek Criminal Forfeiture stating that the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to, all proceeds obtained directly or indirectly from the offense, and all property used to facilitate the offense charged in the Indictment which would be subject to forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c). The Indictment provided notice that the United States was seeking forfeiture of (the “**Subject Property**”):

<b>ASSET ID</b>	<b>PROPERTY DESCRIPTION</b>
22-DEA-692226-01	One (1) American Tactical Rifle, Model Mil-Sport, CAL: 5.56, Serial No. MS012823
22-DEA-692226-02	One (1) Magazine, CAL: 5.56
22-DEA-692226-03	Twenty (20) Rounds of Ammunition, CAL: 5.56
22-DEA-692225-01	One (1) Springfield Armory Pistol, Model Hellcat, CAL: 9mm, Serial No. BA488003

22-DEA-692225-02	One (1) Magazine, CAL: 9mm
22-DEA-692225-03	Fourteen (14) Rounds of Ammunition, CAL: 9mm

3. On July 26, 2022, the jury found Defendant **PATRICK DARNELL DANIELS, JR.** guilty beyond a reasonable doubt as to the single count in the Indictment.

4. The United States is entitled to forfeit **the Subject Property**, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) and Rule 32.2 of the Federal Rules of Criminal Procedure.

5. Upon the issuance of a preliminary order of forfeiture, the United States will provide written notice to any known third-party asserting a legal interest in **the Subject Property** and will publish notice of the Court's order and the intent of the United States to dispose of **the Subject Property** in such manner as the United States Attorney General may direct, pursuant to 21 U.S.C. § 853(n)(1).

6. The undersigned counsel has asked the counsel for the Defendant as to whether he would oppose this motion for preliminary order of forfeiture and advises that the defense has no objection to the motion.

In sum, the United States of America respectfully requests that this Court enter a judgment of criminal forfeiture by issuing the proposed preliminary order of forfeiture, forfeit to the United States the interest of Defendant **PATRICK DARNELL DANIELS, JR** in **the Subject Property**, and order the United States to seize forthwith **the Subject Property**, and dispose of it in accordance with the law.

**RESPECTFULLY SUBMITTED** this the \_\_\_\_\_ day of July 2022.

DARREN J. LAMARCA  
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